

1 ROBERT A. NAEVE (State Bar No. 106095)
2 SHAWN M. LARSEN (State Bar No. 204439)
3 MORRISON & FOERSTER LLP
4 19900 MacArthur Boulevard
5 Suite 1200
6 Irvine, California 92612-2445
7 Telephone: (949) 251-7500

8
9
10 Attorneys for Defendant
11 TARGET CORPORATION sued erroneously as
12 TARGET CORPORATION dba
13 TARGET T-615

14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

SHERIE WHITE,

Plaintiff,

v.

TARGET CORPORATION dba
TARGET T-615; and DOES 1
through 10,

Defendants.

Case No. CIV.S-04-1338 DFL (PAN)

STIPULATION OF DISMISSAL AND
[PROPOSED] ORDER THEREON

Pursuant to Federal Rule of Civil Procedure 41(a), plaintiff Sherie White (“Plaintiff”) and defendant Target Corporation (“Target”) hereby stipulate that this action, including all claims for relief that have been or could have been asserted by Plaintiff in connection with the general set of facts and circumstances underlying this action, shall be dismissed with prejudice in their entirety. The parties also stipulate that each party shall bear their own attorneys’ fees and costs in this action. The parties further stipulate that this Court shall retain jurisdiction to the extent necessary to enforce

the terms of the Confidential Settlement and Release Agreement reached between the parties.

Dated: April 7, 2005.

LYNN HUBBARD, III
LAW OFFICES OF LYNN HUBBARD

By: Lynn Hubbard

Lynn Hubbard, III
Attorneys for Plaintiff
SHERIE WHITE

Dated: April 28, 2005.

ROBERT A. NAEVE
SHAWN M. LARSEN
MORRISON & FOERSTER LLP

By: /s/ Shawn Larsen

Shawn M. Larsen
Attorneys for Defendant TARGET
CORPORATION

ORDER

IT IS SO ORDERED.

DATED: 4/29/2005

/s/ David F. Levi
DAVID F. LEVI
United States District Judge